

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

THE PINES CHURCH, a Maine non-profit corporation; **Matt Gioia**, an individual;

Plaintiffs,

vs.

HERMON SCHOOL DEPARTMENT;

Defendant.

Civil Action No.: 1:23-cv-00214-LEW

**PLAINTIFFS' SUPPLEMENTAL JURY
VOIR DIRE**

Pursuant to the Court's instruction in its order dated August 26, 2025 (ECF No. 116), Plaintiffs The Pines Church and Matt Gioia ("Pastor Gioia") (collectively, "Plaintiffs"), respectfully submit the following proposed supplemental jury voir dire questions for the jury panel¹:

1. Do you believe that there are any political or religious views a person could have that would disqualify the person from renting a public space?
2. Have you ever felt treated unfairly by someone in authority because your views differed from theirs?
3. Do you think people who hold minority views should ever face discrimination in business transactions because of those beliefs?
4. Do you believe the government may require a political or religious "belief test" when deciding whether a group can rent a public space?
5. Do you believe that if you are not harming anyone that you should be treated differently because of the beliefs you hold?

¹ Plaintiffs also request that the supplemental questionnaire, Attachment A—previously included in their Pre-Trial Memorandum (ECF No. 114.3)—be distributed to the entirety of the jury pool as a written questionnaire and returned to counsel for all parties within a reasonable time to review the potential juror's answers to the supplemental questionnaire prior to voir dire.

6. Does anyone have an issue or disagree with the protections that the First Amendment provides to specifically protect religious exercise and freedom of speech?
7. Do you hold strong political views regarding abortion? Being honest, if a party in this case holds pro-life/anti-abortion views, would this cause you to look at the person differently or not be impartial?
8. Do you hold strong political views regarding same-sex marriage? Being honest, if a party in this case holds views that conflict with yours on this issue, would this cause you to look at the person differently or not be impartial?
9. Do you hold strong political views regarding gender-affirming medical care? Being honest, if a party in this case holds views that conflict with yours on this issue, would this cause you to look at the person differently or not be impartial?

Respectfully submitted,

ADVOCATES FOR FAITH & FREEDOM

Dated: September 19, 2025

/s/ Julianne Fleischer

Julianne Fleischer, Esq., Bar No. 337006

(*Pro Hac Vice Admission***)

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Attachment A

Plaintiffs' Proposed Voir Dire Questionnaire

The Plaintiffs in this case is a nondenominational Christian church and its pastor, Matt Goia. It would be naive to deny that some persons in our society have strong feelings about religion generally, particular religious organizations, and ministers of religious organizations. Strong feelings may arise out of the religiously based views that a religious organization may hold such as views relating to current topics of debate in the culture. Therefore, we need to know if you have any personal animus toward any particular religious group, organization, or ministers, and whether those feelings are sufficiently strong that they would impair your ability to act impartially as a juror in this case.

Please complete the following questionnaire to assist the attorneys and me in selecting a jury to serve in this case. Using the questionnaire helps us ask fewer questions in court.

Please complete this form honestly, completely, and with great care. There are no right or wrong answers. The responses will be reviewed only for the purpose of selecting a jury.

Beginning immediately, you are ordered not to discuss this case or questionnaire with anyone, including your family, friends, and fellow prospective jurors. Do not email, blog, tweet, text, or post about the questionnaire or trial. Do not do any internet or other research, such as searching for information about the case or any of the people involved. Do not read, listen to, or watch any news reports about this case or any of the people involved.

While some of the questions may seem very personal, I have reviewed them carefully and determined that they are relevant to the issues in this case. The questions are not meant to invade your privacy but to help select a fair jury. If there is sensitive personal information that you prefer not to discuss in front of other jurors, please write "PRIVATE" next to your answer to that question, but please still answer the question. If the attorneys need to follow up with you about a private response, the attorneys and I will speak with you about that response outside the presence of the other jurors.

Please write clearly, and do not leave any questions blank. If a question does not apply to you, write "N/A" (for "not applicable"), rather than leaving the response blank. If you do not understand the question or do not know the answer, please write that in the space provided. If you need more space for a response or want to make further comments about any question, please use the extra sheets

attached to the back of the questionnaire. Do not write on the back of any page. If you use the explanation sheets, please be sure to indicate which numbered question you are answering.

You are expected to sign the questionnaire, and your answers will be treated the same way as if they were made in court under oath.

Thank you for your cooperation.

SUPPLEMENTAL JUROR QUESTIONNAIRE

Name: _____

1. If your children are adults and employed, what type of work do they do? Include the job titles of your children and the names of their employers.

2. Have you ever served in the military?

Yes No

- a. If yes, during what years did you serve and in which branch?

3. Do you or have you volunteered in the past five years for or with any charities, clubs, nonprofits, or other organizations, including religious or political organizations?

Yes No

- a. If yes, which ones?

4. If you have served as a juror before, please answer the questions below. If you have never served as a juror, please move on to question 5. If you have served as a juror more than once, please include answers for all cases in which you have served as a juror.

a. How many times have you served as a juror?

b. Where and when did you previously serve as a juror?

c. Did you reach a verdict?

d. Were you satisfied with the outcome?

e. Is there anything about that experience that would make it difficult for you to serve as a juror in this case?

5. Where do you get most of your news?

- a. If TV, which channels? (CNN, Fox, MSNBC, NewsMax, One America News, etc.)

- b. If the internet, which websites? (NYTimes.com, WashingtonPost.com, FoxNews.com, NYPost.com, Yahoo.com, etc.)

- c. If social media, which social media platforms? (Facebook, Twitter/X, Instagram, TikTok, Truth Social, etc.)

- d. Any others? (for example, physical newspapers or magazines)

6. What podcasts or radio programs do you listen to, if any?

7. What are your three favorite books, movies, or television shows?

8. Do you drive?

Yes No

9. If you drive a vehicle, what bumper stickers, if any, are on your vehicle?

10. Do you attend a church or other place of worship on a regular basis?

Yes No

11. If "yes," what is the name of church or other place of worship that you attend?

12. How long have you attended this church or other place of worship?

13. If you had to live in a state other than Maine, which state would you want to live in and why?

14. Have you ever personally participated in a political protest or any form of social activism? If so, please briefly describe the cause at issue and what viewpoint you were expressing or which side you were supporting by your protest/activity.

15. The legal issues in this case do not involve abortion, but there may be evidence about some of the parties' views on and advocacy for and against abortion rights. If so, do you hold any views on abortion that would prevent you from serving as a fair and impartial juror in this case?

Yes No

a. If yes, you may explain below.

16. The legal issues in this case do not involve same-sex marriage, but there may be evidence about some of the parties' views on and advocacy for and against same-sex marriage. If so, do you hold any views on same-sex marriage that would prevent you from serving as a fair and impartial juror in this case?

Yes No

a. If yes, you may explain below.

17. The legal issues in this case do not involve gender affirming medical care, but there may be evidence about some of the parties' views on and advocacy for and against gender affirming medical care. If so, do you hold any views on gender affirming medical care that would prevent you from serving as a fair and impartial juror in this case?

Yes No

a. If yes, you may explain below.

[illegible]